## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

UNITED STATES OF AMERICA

 $\omega$   $\omega$   $\omega$   $\omega$   $\omega$   $\omega$   $\omega$ 

**CASE NUMBER: 3:23CR00497** v.

JORGE GUADALUPE PALAFOX, JR.

## **DEFENDANT'S MOTION FOR CONTINUANCE OF PRE-TRIAL AND TRIAL DATES** TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Jorge Guadalupe Palafox, Jr., by and through his attorney of record, MARK A. PEREZ, would show the Court the following:

I.

This matter is set for Pre-Trial Conference on June 14, 2024, at 10:00 am. Jury Trial is scheduled for June 24, 2024 at 9:00 am.

II.

The parties are in discussions about whether the matter can be resolved absent the need for a trial. Furthermore, additional time is needed to review all possible options for resolutions with Defendant, so that Defendant can make a fully informed decision regarding the disposition of his case.

III.

This is the second request for continuance by the undersigned.

IV.

This Motion is not made for the purpose of delay, but so that justice may be served.

WHEREFORE, PREMISES CONSIDERED, Defendant, through Counsel, pray that the Court enter an order rescheduling the time for Final Pre-Trial Conference and Trial dates.

Defendant requests at least a 30-day continuance.

RESPECTFULLY SUBMITTED,

/S/ MARK A. PEREZ

MARK A. PEREZ, P.C. STATE BAR NO. 15777750 3300 OAK LAWN AVE. SUITE 700

Dallas, Texas 75219 Phone: (214) 752-0505 Fax: (214) 845-7006

ATTORNEY FOR DEFENDANT JORGE GUADALUPE PALAFOX, JR.

## **CERTIFICATE OF CONFERENCE**

On the 15<sup>TH</sup> day of April 2024, the undersigned conferred with Walter Junker, Assistant United States Attorney, who stated she does not oppose Defendant's Motion for Continuance of Pre-Trial and Trial Dates.

/s/ Mark A. Perez

MARK A. PEREZ

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above foregoing motion was served upon all counsel of record by electronic filing on the 15<sup>th</sup> day of April 2024.

/s/ Mark A. Perez

MARK A. PEREZ